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May 31, 2024

Via Federal Electronic Service

Honorable Judge David Hittner
United States District Court, Southern District
515 Rusk Street, Room 8509
Houston, Texas 77002

RE: Cause No.2023-08074; *Joshua Santos v. Fugro, Inc., Fugro (USA), Inc., Fugro USA Marine, Inc., Laredo Construction, Inc., and Laredo Offshore Services, Inc.* in the United States District Court for the Southern District of Texas, Houston Division.

JOINT STATUS REPORT OF PETITIONER AND CLAIMANT

Honorable Judge Hittner,

Please allow this correspondence to serve as ***Petitioner and Claimant's Joint Status Report*** pursuant to this Court's Order dated March 19, 2024 (Doc. No. 46).

I. BACKGROUND

The underlying personal injury case *Joshua Santos v. Fugro, Inc., Fugro (USA), Inc., Fugro USA Marine, Inc., Laredo Construction, Inc., and Laredo Offshore Services, Inc.* C.A. No. 2023-08074 is currently set for trial in the state court on September 9, 2024.

II. DISCOVERY ONGOING

The parties are currently proceeding to take depositions of corporate representatives of the defendants, additional fact witnesses and will be scheduling expert depositions including medical experts and treaters in the near future.

III. MOTION FOR ENTRY OF AGREED DOCKET CONTROL ORDER

The parties also currently plan to jointly move the state court for a new docket control order requesting a new trial date and amended deadlines accordingly including a deadline by which to mediate the underlying state court case which if successful will dispose of this case.

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The parties will continue to timely inform this Court of the status of the underlying state court case should there be any relevant developments and/or proceed as this Court may further direct.

Sincerely,

**SCHOUEST, BAMDAS, SOSHEA, BENMAIER &
EASTHAM**



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Joint Status Report of Petitioner and Claimant has been forwarded to all known counsel of record in accordance with the Federal Rules of Civil Procedure on this 31st day of May 2024.



SUSAN NOE WILSON